

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

JOAO BOCK TRANSACTION SYSTEMS,
LLC,

Plaintiff,

v.

SCOTTRADE, INC.,

Defendant.

Case No. 4:13-cv-01254-CDP

Judge Catherine D. Perry

**JOINT MOTION FOR ENTRY OF PROTOCOL FOR DISCOVERY OF
ELECTRONICALLY-STORED INFORMATION (THE “ESI” ORDER)**

Pursuant to the Federal Rules of Civil Procedure, the Local Rule of the Eastern District of Missouri, and this Court’s Case Management Order (Dkt. No. 52), Plaintiff Joao Bock Transaction Systems, LLC (“JBTS”) and Defendant Scottrade, Inc. (“Defendant”) respectfully submit a Joint Motion for Entry of the Protocol for Discovery of Electronically-Stored Information (hereinafter referred to as the “ESI Order”; attached hereto as Exhibit A).

The Parties met and conferred on the terms of the Proposed ESI Order, and have reached agreement on all provisions.

Respectfully submitted,

November 13, 2013,

By: s/ Jonathan R. Miller
Jonathan R. Miller (*pro hac vice*)
HENINGER GARRISON DAVIS LLC
3621 Vinings Slope, Suite 4320
Atlanta, Georgia 30339
Telephone: (404) 996-0863
Facsimile: (205) 557-5506
jmiller@hgdlawfirm.com

Steven W. Ritcheson (*pro hac vice*)
HENINGER GARRISON DAVIS LLC
9800 D. Topanga Canyon Blvd., #347
Chatsworth, California 91311
Telephone: (818) 882-1030
Facsimile: (205) 326-3332
swritcheson@hgdlawfirm.com

Maureen V. Abbey (*pro hac vice*)
HENINGER GARRISON DAVIS LLC
220 Saint Paul Street
Westfield, New Jersey 07090
Telephone: (908) 379-8475
Facsimile: (908) 301-9008
maureen@hgdlawfirm.com

James G. Onder, SBN 38049MO
Michael S. Kruse, SBN 57818MO
ONDER, SHELTON, O'LEARY & PETERSON, LLC
110 E. Lockwood Ave.
St. Louis, Missouri 63119
Telephone: (314) 963-9000
Facsimile: (314) 963-1700
onder@onderlaw.com
kruse@onderlaw.com

ATTORNEYS FOR PLAINTIFF
JOAO BOCK TRANSACTION SYSTEMS, LLC

By: s/ B. Scott Eidson
James G. Martin, SBN 33586MO
Jennifer E. Hoekel, SBN 45880MO
B. Scott Eidson, SBN 57757MO
ARMSTRONG TEASDALE LLP
7700 Forsyth Blvd., Suite 1800
St. Louis, Missouri 63105
Telephone: (314) 621-5070
Facsimile: (314) 621-5065
jmartin@armstrongteasdale.com
jhoekel@armstrongteasdale.com
seidson@armstrongteasdale.com

Scott J. Bornstein (*pro hac vice*)
Allan A. Kassenoff (*pro hac vice*)
GREENBERG TRAURIG, LLP
MetLife Building
200 Park Avenue
New York, New York 10166
Telephone: (212) 801-9200
Facsimile: (212) 801-6400
bornsteins@gtlaw.com
kassenoffa@gtlaw.com

Nicholas A. Brown (*pro hac vice*)
GREENBERG TRAURIG, LLP
4 Embarcadero Center - Suite 3000
San Francisco, California 94111-5983
Telephone: (415) 655-1300
Facsimile: (415) 707-2010
brownn@gtlaw.com

ATTORNEYS FOR DEFENDANT
SCOTTRADE, INC.